

# **Exhibit 42**

Page 1

1 IN THE UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEW JERSEY  
3 MDL NO. 16-2738 (MAS)(RLS)

IN RE: JOHNSON & JOHNSON :  
4 TALCUM POWDER PRODUCTS :  
MARKETING, SALES PRACTICES :  
5 AND PRODUCTS LIABILITY :  
LITIGATION :

<p>1 APPEARANCES:</p> <p>2</p> <p>3 ATTORNEYS FOR PLAINTIFF:</p> <p>4 (Via videoconference) ASHCRAFT &amp; GEREL, LLP</p> <p>5 BY: MICHELLE A. PARFITT, ESQ., and BY: PATRICK K. LYONS, ESQ.</p> <p>6 4900 Seminary Road, Suite 650 Alexandria, Virginia 22311</p> <p>7 (844) 680-0339 mparfitt@ashcraftlaw.com</p> <p>8 plyons@ashcraftlaw.com</p> <p>9 - and -</p> <p>10 (Via videoconference) LEVIN PAPANTONIO RAFFERTY, P.A.</p> <p>11 BY: CHRISTOPHER V. TISI, ESQ. 316 South Baylen Street</p> <p>12 Pensacola, Florida 32502</p> <p>13 (850) 435-7000 ctisi@levinlaw.com</p> <p>14</p> <p>15 ATTORNEYS FOR THE DEFENDANT:</p> <p>16 (Via videoconference) SKADDEN, ARPS, SLATE, MEAGHER &amp; FLOM LLP</p> <p>17 BY: CATHERINE I. MULLALEY, ESQ. 500 Boylan Street</p> <p>18 Boston, Massachusetts 02116</p> <p>19 (617) 573-4800 kate.mullaley@skadden.com</p> <p>20 - and -</p> <p>21 (Via videoconference) SKADDEN, ARPS, SLATE, MEAGHER &amp; FLOM LLP</p> <p>22 BY: RACHEL PAPALSKI, ESQ. One Manhattan West</p> <p>23 New York, New York 10001</p> <p>24 (212) 735-3000 rachel.papalski@skadden.com</p> <p>25</p>	Page 2	Page 4
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1	L I T I G A T I O N S U P P O R T		
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<p>1 correct?</p> <p>2 A. That's correct if it's included</p> <p>3 with ovarian cancer cases in individual</p> <p>4 studies.</p> <p>5 Q. So have you done and conducted a</p> <p>6 Bradford Hill analysis to specifically whether</p> <p>7 there's an association between just fallopian</p> <p>8 tube cancer and talcum powder use?</p> <p>9 MS. PARFITT: Objection. Form.</p> <p>10 THE WITNESS: My Bradford Hill</p> <p>11 analysis was on talcum powder use; and</p> <p>12 ovarian cancer and ovarian cancer can</p> <p>13 include fallopian tube cancer.</p> <p>14 BY MS. MULLALEY:</p> <p>15 Q. And sort of in that vein, are you</p> <p>16 offering an opinion that all types of ovarian</p> <p>17 cancer, regardless of whether or not they are</p> <p>18 epithelial ovarian cancer, are associated with</p> <p>19 the genital use of talcum powder?</p> <p>20 MS. PARFITT: Objection.</p> <p>21 You may answer.</p> <p>22 THE WITNESS: My opinion is that</p> <p>23 talcum powder use can cause all types of</p> <p>24 epithelial ovarian cancer.</p> <p>25</p>	<p>Page 18</p> <p>1 MS. PARFITT: Objection. Asked and</p> <p>2 answered.</p> <p>3 THE WITNESS: That's correct.</p> <p>4 BY MS. MULLALEY:</p> <p>5 Q. And is it fair to say that you have</p> <p>6 not formed an opinion as to whether or not</p> <p>7 ovarian carcinosarcoma is caused by -- or is</p> <p>8 associated with the use of talcum powder?</p> <p>9 MS. PARFITT: Objection. Asked and</p> <p>10 answered.</p> <p>11 And, Kate, the purpose of those</p> <p>12 objections is that these questions were</p> <p>13 inquiries that were made at the prior two</p> <p>14 depositions.</p> <p>15 MS. MULLALEY: And just to add that</p> <p>16 I did my very best to go back and look</p> <p>17 through all of Dr. McTiernan's prior</p> <p>18 testimony, and I did not see questions</p> <p>19 about specifically germ cell, stromal,</p> <p>20 small cell; and then I specifically just</p> <p>21 asked about the other gynecological</p> <p>22 cancers just based on what</p> <p>23 Ms. McTiernan -- or Dr. McTiernan said</p> <p>24 about reliance on the Chang.</p> <p>25 MS. PARFITT: Okay. And that's why</p>
<p>1 BY MS. MULLALEY:</p> <p>2 Q. So have you formed the -- so is it</p> <p>3 fair to say that you've not formed the opinion</p> <p>4 or it is not your opinion -- sorry. Strike</p> <p>5 that. I'll start over.</p> <p>6 Is it fair to say that you have not</p> <p>7 formed the opinion that the genital use of</p> <p>8 talcum powder products can cause germ cell</p> <p>9 ovarian cancer?</p> <p>10 MS. PARFITT: Objection. Asked and</p> <p>11 answered.</p> <p>12 THE WITNESS: That's correct.</p> <p>13 BY MS. MULLALEY:</p> <p>14 Q. And are you -- is it fair to say</p> <p>15 that you have not formed the opinion as to</p> <p>16 whether stromal cell ovarian cancer is</p> <p>17 associated with the use of talcum powder?</p> <p>18 MS. PARFITT: Objection. Asked and</p> <p>19 answered.</p> <p>20 THE WITNESS: That's correct.</p> <p>21 BY MS. MULLALEY:</p> <p>22 Q. And it's fair to say that you have</p> <p>23 not formed the opinion that small cell</p> <p>24 carcinomas of the ovary are associated with the</p> <p>25 use of talcum powder?</p>	<p>Page 19</p> <p>1 I was giving a little bit of a runway.</p> <p>2 Some of these are pretextual, and I hope</p> <p>3 that that we can work that way; but they</p> <p>4 were asked in different forms, but same</p> <p>5 answer. But thank you.</p> <p>6 BY MS. MULLALEY:</p> <p>7 Q. So, Dr. McTiernan, just going back</p> <p>8 to the studies, the three studies, that you</p> <p>9 specifically reviewed over the weekend.</p> <p>10 Is it your testimony that the first</p> <p>11 time that you reviewed the O'Brien 2022 study</p> <p>12 was this weekend, or were you just re-reviewing</p> <p>13 it?</p> <p>14 A. So these studies you're talking</p> <p>15 about are the fibroid and -- well, why don't</p> <p>16 you -- why don't you mention which of the three</p> <p>17 studies you're talking about because there are</p> <p>18 a lot of O'Brien studies in my reliance.</p> <p>19 Q. It was the -- I believe you</p> <p>20 mentioned that you had reviewed over the</p> <p>21 weekend O'Brien 2022, Ogunsina 2023; and then I</p> <p>22 think you had also -- was it a study or just</p> <p>23 you had prepared some calculations?</p> <p>24 A. Yes. I prepared some calculations</p> <p>25 from the Chang study and Gonzalez and also the</p>

<p>1 Sister Study data that was in the O'Brien  2 pooled analysis.</p> <p>3 Q. And so was that -- going back to my  4 question, was this O'Brien 2022 study that you  5 reviewed over the weekend, was that the first  6 time that you reviewed that study?</p> <p>7 A. And you're talking O'Brien 2022 is  8 the cervical cancer study?</p> <p>9 Let's see. I don't have the dates  10 memorized.</p> <p>11 MS. PARFITT: It's the Nature study  12 if that helps direct. And I appreciate  13 your letting me know that.</p> <p>14 THE WITNESS: Yes. So this weekend  15 would have been the first time I looked at  16 that, yes.</p> <p>17 BY MS. MULLALEY:</p> <p>18 Q. Was the Ogunsina the first study --  19 the 2023 study that you reviewed over the  20 weekend, was that the first time that you  21 reviewed that study?</p> <p>22 A. I may have seen it before, but I  23 didn't read it in depth. And by saying I saw  24 it before, I may have seen it on a previous  25 reference or a previous search because I</p>	<p>Page 22</p> <p>1 you with the Ogunsina 2023 article?  2 MS. PARFITT: Objection. Form.  3 THE WITNESS: I can't recall if I  4 downloaded this or if it was sent. It may  5 have been sent because we -- we -- they  6 knew that I had done this search. But I  7 just -- I just can't remember if I had --  8 which one I'm looking at, if I'm looking  9 at one that I sent or one that I  10 downloaded.</p> <p>11 BY MS. MULLALEY:</p> <p>12 Q. So I'd need to ask you some  13 questions. One of the documents -- some of the  14 documents that you produced to us last week  15 include a number of your invoices, and I'd like  16 to ask you some questions about those invoices.</p> <p>17 I'd like to go ahead and mark the  18 collection of invoices that you produced on  19 March 28th, 2024, as Exhibit 2. And that  20 should be Tab 2 in your binder, Dr. McTiernan.</p> <p>21 (Whereupon, Defendant's Exhibit D2,  22 Collection of McTiernan Invoices, was  23 marked for identification.)</p> <p>24 THE WITNESS: Okay.</p> <p>25</p>
<p>1 recalled the fibroids is something that had  2 been looked at. But because it wasn't -- I  3 didn't look in depth at it, so this is the  4 first time I really read it.</p> <p>5 Q. Why did you review the Ogunsina  6 2023 study? And.</p> <p>7 Apologies if I'm messing up the  8 pronunciation.</p> <p>9 A. Because I was interested in what  10 other things these authors, the Sister Study  11 authors had looked at and how they had  12 approached it for different outcomes.</p> <p>13 And, you know, these -- these are  14 out comes that are in the same women, the same  15 study that the Sister Study ovarian cancer  16 analysis was done in.</p> <p>17 Q. Does the Ogunsina 2023 article  18 impact your opinions in this case in any way?</p> <p>19 MS. PARFITT: Objection. Form.</p> <p>20 THE WITNESS: It doesn't include  21 data on ovarian cancer, and it doesn't  22 affect my opinion on the association  23 between ovarian cancer and use of talc.</p> <p>24 BY MS. MULLALEY:</p> <p>25 Q. Did the plaintiff's lawyers provide</p>	<p>Page 23</p> <p>1 BY MS. MULLALEY:</p> <p>2 Q. And so first off, are these all the  3 invoices that you have submitted to the  4 plaintiff's lawyers for your work in the talc  5 litigation from August 2021 to today?</p> <p>6 A. They should be. I'm trying to see  7 these dates. It looks like it's complete. I  8 don't have my own invoices in front of me, so I  9 can't be absolutely sure; but I did talk about  10 it -- a little bit about it before. So if they  11 sent everything that we talked about, then it  12 would be complete.</p> <p>13 Q. I noticed that a these invoices do  14 not include your work on the Giese trial.</p> <p>15 In addition to the Giese trial, do  16 you have any invoices from any other talc cases  17 that were not produced last week?</p> <p>18 MS. PARFITT: And you're referring  19 to the Giese -- the state court trial?</p> <p>20 MS. MULLALEY: Yes.</p> <p>21 MS. PARFITT: Okay. I believe  22 those were, frankly, provided to counsel  23 during the course of that particular  24 litigation. We did not -- Dr. McTiernan  25 was not an expert for -- for our firm in</p>

<p style="text-align: right;">Page 170</p> <p>1 deposition, have you conducted a Bradford Hill    2 analysis to analyze the association between    3 clear cell carcinoma and perineal talc use?    4 MS. PARFITT: Objection. Form.    5 THE WITNESS: No.    6 BY MS. MULLALEY:    7 Q. I want to now turn to the table    8 that you produced this morning, I think, at    9 8 a.m. Eastern Time. It is a table of three    10 studies called, "Sisters' Study results on    11 vaginal/genital talc and ovarian cancer risk in    12 3 publications."    13 MS. MULLALEY: And I'll go ahead    14 and mark that as Exhibit 17.    15 (Whereupon, Defendant's    16 Exhibit D17, Sisters' Study results on    17 vaginal/genital talc and ovarian cancer    18 risk in 3 publications, was marked for    19 identification.)    20 BY MS. MULLALEY:    21 Q. Do you have a copy of that in front    22 of you?    23 A. I do, yes.    24 Q. When did you prepare this table?    25 A. So this would have been yesterday,</p>	<p style="text-align: right;">Page 172</p> <p>1 changed if it did.    2 I use the word "genital" up top    3 because one of the authors calls it genital. I    4 can't -- I think it's Chang calls it -- sorry,    5 Chang calls it vaginal, but the other ones seem    6 to call it genital.    7 And so what I did was, then, look    8 at the number of years followed, the median    9 number of years that they reported for each of    10 those publications; the number of cases -- N    11 means number -- the number of cases that were    12 in each of those publications, cases of ovarian    13 cancer; what they defined as talc use, and the    14 first study and Gonzalez, it was only ever    15 versus never use.    16 The O'Brien pooled looked at --    17 sorry. Gonzalez was ever in the 12 months    18 before entering the study. O'Brien looked at    19 ever either in the 12 months before study entry    20 or at age 10 to 13. And then Chang created a    21 variable, and that variable was for each one    22 unit increase in frequency of use what's the    23 risk of ovarian cancer.    24 So the relative risk that Gonzalez    25 was reported 0.73, so that's less than 1. It's</p>
<p style="text-align: right;">Page 171</p> <p>1 the day before. No. I started it the day    2 before, fixed it up yesterday, and sent it to    3 the lawyers last night.    4 Q. Did the lawyers ask you to prepare    5 this table?    6 A. No.    7 Q. And why did you prepare this table?    8 A. Because this is -- these are    9 results from one study, and I've seen from    10 years of doing epidemiology and also from years    11 of reviewing intel, that cohort studies often    12 will redo analyses for a given exposure when    13 they have more cases are accrued to this study.    14 And so Sister Study, their first    15 study was published in 2016. They only had 154    16 cases then. But I notes had when I looked at    17 Chang, that that study, that they had 277    18 cases. So almost twice as many cases.    19 And so I knew that also the O'Brien    20 pooled analysis had data from Sisters. And so    21 I wanted to see what had happened over time in    22 these three analyses of the same study, same    23 data that was collected at baseline to see    24 what -- how the association between perineal    25 talcum powder use and ovarian cancer risk</p>	<p style="text-align: right;">Page 173</p> <p>1 not showing an increased risk. In -- at -- in    2 O'Brien those pooled data showed that ever    3 versus never increased risk of 1.02, so it's no    4 longer a negative, no longer below 1.    5 And then Chang looked -- computed    6 the variable of per-unit change and found for    7 each one unit increase, the relative risk was    8 1.06.    9 Now, what they interpret in Chang,    10 they help us understand what that one unit    11 increase means. And they say -- they use the    12 example for one of their breast cancer results,    13 and it says, "Although the observed effects of    14 a one-frequency-level increase were modest in    15 magnitude, the impact would be more    16 substantially -- substantial when comparing the    17 most frequent users with the never users. For    18 example, in 8 percent higher hazard of the    19 postmenopausal breast cancer for    20 one-frequency-level increase in the beauty    21 mixture could translate to approximately a    22 36-percent higher hazard for the most frequent    23 users compared with the never users."    24 So on the -- the right-hand column,    25 I look at relative risk for frequent use in</p>

<p style="text-align: right;">Page 174</p> <p>1 those three publications. Gonzalez did not 2 present that. The O'Brien pooled analysis 3 showed a relative risk of 1.25 with a 4 confidence interval of 0.76 to 2. And then 5 Chang gave us the one-unit increase.</p> <p>6 And so in order to get to the fifth 7 level, which is five or more times a week -- 8 that's the most frequent -- you would multiply 9 1.6 times 1.6 times 1.6 -- sorry, 1. -- sorry. 10 Start again.</p> <p>11 Multiply 1.06 times 1.06 times 1.06 12 times 1.06 for a number -- a hazard ratio 13 relative risk of 1.26 or a 26-percent increased 14 risk.</p> <p>15 So this tells me two things: One, 16 this cohort study is showing similar results to 17 some of the case controlled studies and the 18 pooled meta-analyses of elevated relative risk 19 with use of ovar- -- with use of perineal talc.</p> <p>20 And it also shows that change in 21 time with more follow-up, more numbers of 22 cases, you get a change in the relative risk 23 that is seen. So the first Sister Study was 24 very early look, and it was premature, it turns 25 out, because when you follow people longer and</p>	<p style="text-align: right;">Page 176</p> <p>1 THE WITNESS: My table used the 2 same method that they showed of how to 3 calculate the odds ratio and didn't 4 require in knowing the numbers of women in 5 each particular category.</p> <p>6 BY MS. MULLALEY:</p> <p>7 Q. So I'd like to mark as 8 Exhibit 17 -- sorry 18, the Chang 2024 study; 9 and it is Tab 17 in your -- in your binder, the 10 second volume binder.</p> <p>11 (Whereupon, Defendant's 12 Exhibit D18, Article entitled, "Use of 13 personal care product mixtures and 14 incident hormone-sensitive cancers in the 15 Sister Study: A U.S.-wide prospective 16 cohort," by Che-Jung Chang, et al., was 17 marked for identification.)</p> <p>18 BY MS. MULLALEY:</p> <p>19 Q. Dr. McTiernan, if you turn to 20 page 3 of Chang 2024 under Section 2.5, 21 Statistical Analysis --</p> <p>22 A. I'm sorry. Which -- which page are 23 you talking about of Chang?</p> <p>24 Q. Page -- page 3 of Chang. 25 A. Okay.</p>
<p style="text-align: right;">Page 175</p> <p>1 you look at frequent use, you see an elevated 2 risk.</p> <p>3 Q. So Dr. McTiernan, you know the 4 authors of Chang 2024 never provided an HR for 5 women who used vaginal talc five times a week, 6 right?</p> <p>7 A. They provide a relative risk for 8 those who used one-unit change. So they 9 provided a relative risk of 1.06 for each 10 one-unit change, and then they showed us what I 11 read off. They specified at the very last 12 paragraph of the paper of how to interpret what 13 that level means when you look at the highest 14 level.</p> <p>15 Q. Right. But do you know how many 16 women in Chang 2024 reported using vaginal talc 17 five times per week?</p> <p>18 MS. PARFITT: Objection. Form.</p> <p>19 THE WITNESS: I would have to see 20 if they provided it.</p> <p>21 BY MS. MULLALEY:</p> <p>22 Q. But you don't know off the top of 23 your head having done this -- preparing this 24 table over the weekend?</p> <p>25 MS. PARFITT: Objection. Form.</p>	<p style="text-align: right;">Page 177</p> <p>1 Q. Under Section 2.5, Statistical 2 Analysis, the third paragraph, Chang 2024 3 states, quote, "The five level frequency 4 categories of PCP use were treated as 5 continuous variables in all of our analyses 6 assuming an approximate linear relationship and 7 uniform change in the hazard for each increase 8 in the frequency measure."</p> <p>9 Do you see that?</p> <p>10 A. Yes.</p> <p>11 Q. So here they're saying that -- that 12 they're assuming approximate linear 13 relationship, right?</p> <p>14 A. Yes.</p> <p>15 Q. So essentially, this HR that you 16 hypothetically modeled of 1.26 is not based on 17 actual data from the users five times a week, 18 right?</p> <p>19 A. That's not what that says, to my 20 understanding. My understanding, they use all 21 of the data. They put it all in, and they 22 model it to come up with the relative risk that 23 they see overall for each one-unit change. And 24 this is similar to what's done in epidemiologic 25 studies.</p>

<p>1        It's not hypothetical. It's real 2        numbers. 3 BY MS. MULLALEY: 4        Q. But you don't have a confidence 5 interval, right? 6        MS. PARFITT: Objection. Form. 7        THE WITNESS: I didn't have the -- 8 I didn't feel that I had the correct 9 numbers for doing confidence intervals. 10 They didn't provide that in the 11 description at the end of the article. 12        They showed how to calculate the 13 relative risk or hazard ratio for the 14 highest versus lowest level of exposure. 15 BY MS. MULLALEY: 16        Q. And because you don't have a 17 confidence interval to go with this 1.26 18 calculation, there's no way for us to know if 19 it's significant -- 20        MS. PARFITT: Objection. 21 BY MS. MULLALEY: 22        Q. -- right? 23        MS. PARFITT: Objection. Form. 24 Misstates her testimony. 25        THE WITNESS: We just know what it</p>	Page 182	<p>1        Would you agree, Dr. McTiernan, 2 that all three studies on this Exhibit 17 chart 3 that you prepared over the weekend, Gonzalez 4 2016, O'Brien 2020, and Chang 2024, there is 5 not a single statistically significant 6 association reported between vaginal talc use 7 and ovarian cancer? 8        MS. PARFITT: Objection. Misstates 9 the evidence and her testimony. 10        THE WITNESS: I have not looked, 11 again, through all of the data from 12 O'Brien beyond what I inserted into this 13 table; and so I can't answer for that 14 study. 15        I can say from Chang that I 16 couldn't calculate on hazard ratio -- I 17 couldn't calculate the confidence 18 intervals because I didn't feel like I had 19 the right information to do that; so I 20 don't know what that would be. 21        They presented a relative risk of 22 1.06 with a confidence interval of .9 to 23 1.24. So if they're using -- so that 24 tells us that it's a 95-percent chance 25 that the relative risk would fall within</p>	Page 184
<p>1 is and what the authors say could be -- 2 let me see; what are the words that they 3 use -- could translate to a higher hazard 4 of most frequent versus never users. 5 BY MS. MULLALEY: 6        Q. Can you point me to in the Chang 7 2024 article where Chang provides the number of 8 women who reported using vaginal talc five 9 times per week? 10        A. Okay. I'll have to read this and 11 look at the tables. 12        Q. So we don't burn time, do you want 13 to take a break and so you can review the Chang 14 2024 article again? 15        A. No. I can see -- I can see and 16 from my memory also, they did -- they did not 17 include the numbers in each category. They 18 were looking at multiple exposures. 19        They did state that -- however, 20 that both douche and genital talc use were the 21 most important contributors to a mixture of 22 hygiene effects, which was consistent with 23 previous findings. 24        Q. Also, on this table that you 25 have -- strike that.</p>	Page 183	<p>1 that category. 2        If they're using point -- so if 3 they're using -- if they're assuming a 4 confidence interval that includes one 5 means not statistically significant, then 6 that would be the case for this. 7        One of the things that is new here 8 is that this model does adjust for other 9 personal care products, so that's a unique 10 analysis from the Sister Study. 11 BY MS. MULLALEY: 12        Q. And, Dr. McTiernan, I just want to 13 go back to one other question that I was asking 14 you earlier about performing a Bradford Hill 15 analysis about the -- specifically about the 16 subtypes of epithelial ovarian cancer. 17        Is it your opinion that borderline 18 ovarian cancer is associated with the use of 19 perineal talcum powder? 20        MS. PARFITT: Objection. Asked and 21 answered I think just a few minutes ago. 22 Counsel, I'm not try -- 23        MS. MULLALEY: And it's the 24 distinction about whether she performed 25 the Bradford Hill analysis versus her</p>	Page 185